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15
16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 JOSEPH LOMAGLIO, an individual,
19
20 Plaintiff,

21 vs.

22 STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, a foreign
23 corporation; DOES I-X and ROE
24 CORPORATIONS I-X, inclusive,

25 Defendants.
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27
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Case No.: 2:21-cv-00328-KJD-EJY

STIPULATION AND ~~PROPOSED~~
ORDER] FOR EXTENSION OF
TIME TO FILE REPLY TO
DEFENDANT'S RESPONSE TO
PLAINTIFF'S MOTION TO
REMAND

(First Request)

**STIPULATION AND ~~[PROPOSED ORDER]~~ FOR EXTENSION OF TIME TO
FILE REPLY TO DEFENDANT'S RESPONSE
TO PLAINTIFF'S MOTION TO REMAND**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff JOSEPH LOMAGLIO, through his attorneys of record, Dennis M. Prince, Kevin T. Strong, and Angela L. Lee of PRINCE LAW GROUP and Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, by and through its attorneys, Robert W. Freeman, Cheryl A. Grames, and Derek R. Noack of LEWIS BRISBOIS BISGAARD & SMITH, LLP, that the deadline for Plaintiff to file his Reply to Defendant State Farm Mutual Automobile Insurance Company's Response to Plaintiff's Motion to Remand (ECF No. 13) shall be continued by seven (7) days from April 16, 2021 to April 23, 2021. Plaintiff's Motion for Remand was filed on March 29, 2021 (ECF No. 9). This is the first request for extension of time to file a reply to this response. This Stipulation and [Proposed Order] is submitted in accordance with LR IA 6-1.

The parties respectfully request this brief extension because counsel for Plaintiff is currently drafting and finalizing extensive court ordered briefing regarding case terminating sanctions for discovery abuses committed by the defendants in a matter pending in the Eighth Judicial District Court, Clark County, Nevada (Balian v. Pump It Up and Inflatable 2000, A-17-761984-C). The other attorneys at Plaintiff's counsel's law firm are also under deadlines to draft and file a mediation brief, various federal court filings, and an appellate court filing, as well as attend a mediation, all due during the week of April 12-16, 2021.

This short extension of time to file Plaintiff's reply will provide him the time necessary to draft his reply to fully address each of the arguments set forth in Defendants' Opposition and to aid this Court in its ultimate decision as to whether this matter should be remanded back to state court.

1 Accordingly, the parties respectfully request this Court to approve the foregoing
2 stipulation. This requested extension is not made in bad faith or to unnecessarily delay
3 these proceedings.
4

5 DATED this 14th day of April, 2021.

6 **PRINCE LAW GROUP**

7
8 /s/ Dennis M. Prince

9 _____
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24 Attorneys for Plaintiff

25 *Joseph Lomaglio*
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DATED this 14th day of April, 2021.

**LEWIS BRISBOIS BISGAARD
& SMITH, LLP**

/s/ Cheryl A. Grames

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Attorneys for Defendant

*State Farm Mutual Automobile
Insurance Company*

ORDER

IT IS SO ORDERED.

DATED this 15th day of April, 2021.


UNITED STATES MAGISTRATE JUDGE

